

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN ANTHONY REO,

Plaintiff,

v.

MARTIN LINDSTEDT,

Defendant.

Case No. 1:19-CV-02103-SO

Hon. Solomon Oliver, Jr.

Mag. Jonathan D. Greenberg

FILED

NOV 27 2019

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

DEFENDANTS SECOND AMENDED ANSWER TO BRYAN REO WITH COUNTER-CLAIMS AGAINST PLAINTIFF REO AND ADDITIONAL REO PLAINTIFFS AND REO COUNTER-DEFENDANTS,

I. OVERVIEW OF THE AMENDED ANSWER AND COUNTER-CLAIMS

COMES NOW the current Defendant Pastor Martin Lindstedt (hereafter in person described as “Pastor Lindstedt to make a Second Amended Answer to plaintiff Attorney Bryan and to make a Counter-Claim against Bryan Reo as ORDERED by this Court on 18 November 2019. Bryan Reo who has filed two lawsuits, along with Bryan Reo’s father Anthony Domenic Reo and Stefani Rossie Reo have filed between them four lawsuits for defamation against Pastor Lindstedt for \$500,000 each trying to steal Pastor Lindstedt’s South Dakota inheritance, and three of these cases have been removed to federal court. However this Court has ruled that Defendant must stay on point in his Amended Answer else the stripped-down denial will stand as as a “bare-bones” denial of Bryan Reo’s initial complaint. This Court has adjudged that it has jurisdiction to hear this case, that there is diversity jurisdiction.

Pastor Lindstedt contends that there is federal question jurisdiction as well because Bryan Reo is a “limited-purpose” public figure or public figure within White Supremacy / Christian

Identity even though not white, and that Bryan Reo, Reo's father and wife, Reo's fellow lawyers Kyle Bristow and Brett Klimkowsky working with Bryan Reo in a White Supremacist "lawfare" organization, and the Lake County Courts in general and Judge Patrick Condon in particular lack jurisdiction to hear Bryan Reo cases involving Pastor Lindstedt and Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri and have thus violated Pastor Lindstedt's and Lindstedt's Church's First Amendment civil rights to Freedom of Speech, the Press and of Religion. The State of Ohio and Federal Government were sued in the Second Amended Complaint, since struck, for allowing Bryan Reo as an officer of their courts to run wild.

Both Bryan Reo and Pastor Lindstedt have fought with each other over their proper place within White Supremacy and Christian Identity since 2009 – 2010. The proper place for such political and religious strife is on the Internet and within these groups – not the Lake County Court of Common Pleas or even this federal court. However, Bryan Reo and Bryan Reo co-conspirators file this vexatious, malicious, and frivolous litigation against Pastor Lindstedt (and Lindstedt's Church) since 2014 when Bryan Reo found out that Pastor Lindstedt has an inheritance has made it necessary for Pastor Lindstedt to defend his property and his Church before these government courts. Wherefore Pastor Lindstedt presents this stripped-down Answer & Counter-Claim against Bryan Reo as ORDERED.

II. PARTIES

Plaintiff / Counter-Defendant Suing Defendant (and Reo co-conspirators)

1. Bryan Reo is the main Plaintiff acting against Defendant Pastor Lindstedt and if it wasn't for Bryan Reo none of these unnecessary cases would exist. Bryan Reo is a public or limited-purpose public figure within the White Supremacist / Christian Identity community. In fact, Reo is actually a non-white Anti-racist activist and agent provocateur who founded the Foundation

for the MarketPlace of Ideas as a supposed White Supremacist “lawfare” public corporation. Thus while Reo implausibly claims to be a private figure, Reo’s conduct against Pastor Lindstedt and Lindstedt’s Church is that of a public figure with no cause for action under *New York Times v. Sullivan*, 376 US 254. Reo has been abusing legal process against Pastor Lindstedt since April 2014 when Reo filed a federal lawsuit against Pastor Lindstedt, lost, then refiled in Lake County, and after four years has won, whereupon Reo has filed four new lawsuits against Lindstedt, two for itself and one each for its wife and father. Bryan Reo lives in the same house as its wife and father at 7143 Rippling Brook Lane, Mentor Ohio 44060.

2. Stefani Rossi Reo (hereafter Mrs. Reo) is Bryan Reo’s wife. Pastor Lindstedt saw her jumping up and down in the hallway of the Lake County Courthouse at trial on 25 June 2019 trying to get Bryan Reo’s and another person’s attention (who Pastor Lindstedt later found out was Bryan Reo’s father.) Pastor Lindstedt republished a Bryan Reo “Quora” article about her deceiving Reo with talk of wanting children, avoiding a divorce, then deceiving Reo again which Reo since deleted. She is also now suing Pastor Lindstedt for \$500,000 for Lindstedt publishing these observations, even though she was not mentioned by name but rather by nickname. Pastor Lindstedt just filed to remove her case to federal court. Mrs. Reo lives with Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio.

3. **Anthony Domenic Reo** is Bryan Reo’s father (hereafter Bryan Reo’s father). Pastor Lindstedt had counter-sued Bryan Reo’s father in the 2014 federal and 2015 Lake County cases but Bryan Reo evaded service on behalf of its father. The first day of the Lake County trial on 24 June 2019 Bryan Reo told its father to not show up because Pastor Lindstedt was so vile. So the next day when Pastor Lindstedt seen Mrs. Reo jumping around in the hall and neither Reo nor Reo’s father paying any attention to her, Pastor Lindstedt assumed that it was because they were

homosexual mongrels. Later when Bryan Reo sent its 9 Sept 2019 filing for *Stefani Rossi Reo v Martin Lindstedt* 19VC001466 Pastor Lindstedt figured out that what he had mistook for a homosexual mongrel was Bryan Reo's father – a mongrel yes, but probably not a homosexual mongrel. Bryan Reo's father is suing Pastor Lindstedt under the supervision of Bryan Reo for \$500,000 in *Anthony Domenic Reo v. Martin Lindstedt* 19CV001531 in Lake County Ohio. All four of these bogus Bryan Reo cases shall be removed to federal court. *Anthony Domenic Reo v. Martin Lindstedt* 19-CV-2615 is the federal case removed from Lake County. Bryan Reo is having his father and wife help file these cases in order to overwhelm Pastor Lindstedt in legal foolishness trying to gain through abuse of legal process Pastor Lindstedt's inheritance one \$500,000 chunk at a time. Bryan Reo's father lives with Bryan Reo's wife and Bryan Reo at 7143 Rippling Brook Lane, Mentor Ohio 44060.

4. Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI(?), PO Box 381164 Clinton Twp 48038. Law Office (248) 838-9934 BristowLaw@gmail.com is Chairman of the Foundation for the MarketPlace of Ideas (FMI) and Bryan Reo was Bristow's "law clerk" and on the Board of Directors. FMI was a "White Supremacist" 501(c)(3) corporation which practiced "lawfare" for what turned out to be federal agents provocateur "leading" the "Alt-Right" in forcing state university systems to host Richard Spencer – also on the Board of FMI like Bryan Reo and Brett Klimkowsky. FMI dissolved itself in early March 2018 with the resignation of Kyle Bristow. However, Kyle Bristow drafted and wrote a motion for attorney's fees for Brett Klimkowsky and submitted by Bryan Reo on July 24, 2019. Thus Kyle Bristow and Brett Klimkowsky are still actively conspiring with Bryan Reo to steal Pastor Lindstedt's inheritance and violate Pastor Lindstedt's and Lindstedt's Church's First Amendment and other civil rights.

5. Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738)

brett1066@gmail.com was Bryan Reo's lawyer and around July 23 2019 re-appeared under Bryan Reo's Motion for Attorney's Fees which Attorney Kyle Bristow wrote and to make an affidavit for \$4200. Brett Klimkowsky, like Bryan Reo were members of the Board of FMI. However, like Bryan Reo they are actually liberals pretending to be White Supremacists until they decided that they didn't want to play White Supremacist any more in March 2018 after getting public criticism for racism.. All three of FMI Attorneys Reo, Bristow and Klimkowsky are actively working as of July 24, 2019 against Pastor Lindstedt and Lindstedt's Church and so they are hereby added to this suit through counter-claim against Bryan Reo Plaintiffs.

6. Lake County Ohio Court of Common Pleas / Judge Patrick Condon. Bryan Reo uses the Lake County Court of Common Pleas to enrich itself through abuse of legal process both before and now that it is an officer of that Court. Bryan Reo has "won" a judgment for \$40,000 in unnamed compensatory damages, \$50,000 in punitive damages in Reo. v. Lindstedt 15CV001590, and \$15,000 for "false light" against Lindstedt and \$200 in compensatory and \$200 in punitive damages against Pastor Lindstedt's Church in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri in Reo v. The Church of Jesus Christ Christian / Aryan Nations of Missouri 16CV000825 (which claimed jurisdiction when the Mentor Municipal Court declined to exercise becoming a Bryan Reo litigation mill and kicked it up to Lake County). There should be no real jurisdiction regarding what is said over the Internet eight or nine years ago between warring public figures 900 miles apart, several states away and violative of the First Amendment, otherwise there can be no Internet. Yet the Lake County Court and Judge Patrick Condon has held a trial on claims barred by the Ohio Statutes of Limitation, refused to allow Pastor Lindstedt to present evidence in his own favor, issued improper jury

instructions, empaneled a biased jury, and conducted farcical proceedings. Indeed, how is it possible to sue a Church for mere “words” as in *Reo v. Aryan Nations of Missouri* except by violating the First Amendment paper guarantees of Freedom of Speech and Religion and the Press? In this Answer and Counter-Claim Pastor Lindstedt is not adding the Lake County Courts or Judge Patrick Condon at this time for conspiracy and collusion to violate the civil rights of Pastor Lindstedt and Lindstedt’s Church. However upon discovery Pastor Lindstedt intends to joinder these parties as this case progresses.

7. The State of Ohio. The State of Ohio presumes to “license” attorneys who are otherwise self-regulated by their bar associations and Ohio Supreme Court. Thus Bryan Reo has been allowed to run wild filing frivolous and malicious litigation against Pastor Lindstedt and Lindstedt’s Church. Furthermore, the Ohio Supreme Court has given attorneys a false patent of nobility to where Pastor Lindstedt couldn’t defend in their court his Church. Therefore a federal question is why cannot a Church be represented by its clergy as part of its exercise of religion and free speech? Contrary to Bryan Reo’s lies, the Church of Jesus Christ Christian / Aryan Nations of Missouri is NOT a 501 (c)(3) organization or anything else other than a non-profit religious organization for the benefit of Aryan Christian Israelites to advance Dual-Seedline Christian Identity beliefs. Bryan Reo used the mere name “Aryan Nations” to inflame a hostile jury and to get at Pastor Lindstedt under color of trial. Therefore the State of Ohio, its bar associations and legal associations, and its courts absent any jurisdiction over the Church are violating the First Amendment and should be upon discovery possibly be joindered for civil rights violations later albeit not today in the Defendant’s Answer & Counter-Complaint.

8. The US Government. The Federal Government operates agents provocateur and informants designed to go within White Supremacy and Christian Identity groups, especially those calling

themselves Aryan Nations. It is suspected that Bryan Reo is one of these agents provocateur and informants placed to disrupt through bogus legal process Pastor Lindstedt and Lindstedt's Aryan Nations Church. Indeed Bryan Reo has admitted to being a federal informant with others.

Therefore, as this case proceeds via discovery Pastor Lindstedt intends to joinder the Federal Government for letting Bryan Reo serve as an informant and .agent provocateur and as a means of destroying Pastor Lindstedt and Lindstedt's Church through this fraudulent and vexatious litigation in the Lake County Ohio courts and this federal court.

The Defendant(s) / Counter-Claimants Parties.

9. Pastor Martin Lindstedt. Having learned the fundamentals of Christian Identity since the age of 10, Pastor Lindstedt converted to the more militant Dual-Seedline Christian Identity doxology and came into the White Supremacy Movement through operating two local militias post-Waco to 1997. Pastor Lindstedt has operated a web page since Feb 1996, publishing mostly racist and Dual-Seedline Christian-Identity. Since 2009 Pastor Lindstedt has operated a Christian_Nationalist forum at <http://whitenationalist.org/forum> and <http://christian-identity.net/forum> and many other blogs and forums. Pastor Lindstedt has had a podcast and used other Internet media to express his White Supremacist politics and Christian Identity religious views. Bryan Reo has taken it upon itself to take down Pastor Lindstedt's forums, web pages and blogs since March 2010 before Pastor Lindstedt found out Bryan Reo's real name and where it lived on Oct. 29, 2010. Since then Bryan Reo intensified its oppression and suppression of the fact that Bryan Reo isn't white or heterosexual, but until 2013 or 2014 Bryan Reo thought Pastor Lindstedt was poor. Then Bryan Reo found out about Pastor Lindstedt's inheritance of 1800 acres in South Dakota and decided to file a federal lawsuit DMCA lawsuit, then when that was dismissed to immediately file before Lake County Ohio a new lawsuit even though the Ohio

Statute of Limitations had passed. Reo played games with discovery and Lindstedt didn't play so Reo got onto a NIM-Busters forum, impersonated Pastor Lindstedt making death threats against Reo, then sought and gained a fraudulent stalking protection order that Pastor Lindstedt did not contest because Lindstedt didn't want to drive 900 miles to Lake County. After nearly four years of filing Motions to Strike and Continuances two lawsuits, *Reo v. Lindstedt* 15CV001590 and *Reo v. Lindstedt* 16CV000825 went to trial in Lake County and a biased judge (Patrick Condon) refused to allow Pastor Lindstedt to present any evidence in his own favor, refused to acknowledge the Ohio Statutes of Limitations barred prosecution of Reo's litigation, empaneled a biased jury slaving to convict the Aryan Nations pastor and an Aryan Nations Church, refused to sanction Bryan Reo for perjury and abuse of legal process, refused to allow any jury instructions on behalf of Lindstedt, and ruled against Lindstedt so far for a directed verdict of overturning the jury verdict of \$105,000 against Pastor Lindstedt and \$400 against Pastor Lindstedt's Church. Since then Bryan Reo has gotten a lien placed against Lindstedt's South Dakota inheritance and has threatened to sell at Sheriff's sale Pastor Lindstedt's and Roxie Fausnaught's modest primary residence in Missouri while the case is on appeal. Bryan Reo has filed four more bogus and fraudulent lawsuits in Lake County Ohio. The first one filed Bryan Reo v. Martin Lindstedt 19CV001304 for defamation, etc. was removed to this federal court for this instant case, *Reo v. Lindstedt*, 19-cv-2103. Bryan Reo also filed another lawsuit on behalf of its wife, *Stefani Rossi Reo v. Martin Lindstedt* 19CV001466, another one for itself once this case was removed to federal court again in Lake County, *Bryan Reo v. Martin Lindstedt* 19CV001530 (now *Reo v. Lindstedt* 19-CV-2589) and one on behalf of its father *Anthony Dominic Reo* 19CV001531 (now *Anthony Domenic Reo v. Martin Lindstedt* 19-CV-2615) – all seeking \$500,000 apiece in damages in order to get the rest of Pastor Lindstedt's South Dakota

inheritance worth \$2,000,000. Pastor Lindstedt has or is having all of these frivolous Lake County Reo family cases removed to this federal court for trial. Pastor Lindstedt is merely reporting factually on the antics and doings of a federal agent provocateur / ZOGbot limited-purpose public figure named Bryan Reo / SwordBrethren / and other aliases and should have the full protection of the First Amendment. Bryan Reo and Reo conspirators should be counter-sued in order to end and deter this Bryan Reo assault upon the First Amendment and Pastor Lindstedt, Lindstedt's Church, and Lindstedt's property.

10. The Church of Jesus Christ Christian / Aryan Nations of Missouri Is a Church

Corporation in good standing within the State of Missouri since Oct. 2006 when Pastor Lindstedt had Roxie Fausnaught, his woman, file the paperwork before the Missouri Secretary of State for \$25. The purpose of incorporation was to allow Pastor Lindstedt to call himself a "Pastor" and even an ArchBishop without having to buy an expensive and largely worthless credential from some seminary which in any case doesn't know a tenth as much Dual-Seedline Christian Identity doxology as Pastor Lindstedt. This Court has ruled that Pastor Lindstedt's Church cannot be represented by Pastor Lindstedt, its non-lawyer head. (Page 6 Doc. 19 ORDER). However, Bryan Reo has abused his position as an attorney to sue Pastor Lindstedt's Church and Lindstedt's elderly illiterate bed-bound illiterate bed-bound 63-year-old domestic partner Roxie Fausnaught with his frivolous and malicious abuse of legal process. Bryan Reo has bragged in the past that he would "purchase" the name of Ku Klux Klan from some derelict and then initiate spurious litigation against other Klan incorporations to make himself the leader of the Klan. Bryan Reo is doing much the same in an attempt to take over Dual-Seedline Christian Identity Churches on behalf of its friend William Finck and itself.

<http://www.whitenationalist.org/forum/showthread.php?1644-Did-you-know-that-I-m-going-to-sue-Aryan-Klansmen-for-violating-muh-copyright>

10.B Bryan Reo has also gloated that it is going to use litigation to render Pastor Lindstedt penniless by stealing under color of law the assets of Pastor Lindstedt and Lindstedt's Church and give some of it back to William Finck, another federal agent provocateur running a spurious Christian Identity ministry. See "Pray for My Success" of August 2014:

<http://whitenationalist.org/forum/showthread.php?p=11266#post11266>

http://mamzers.org/pastorlindstedt/lindstedt/legal/SoredMamzer/2014/Aug14/SueMarty_25Aug14-a-a.jpg

10.C. Therefore, while Pastor Lindstedt is constrained from having his Church as a victim of Bryan Reo legal assault as a party in this Amended Answer and Counter-Claim, Pastor Lindstedt wishes to make a claim that his and his Church's First Amendment rights to freedom of religion have been violated by Bryan Reo and Reo co-conspirators and make of it a federal question under 42 U.S.C. 1983 and other sections of the federal code as discovery progresses.

III. JURISDICTION AND VENUE

11. This Court acknowledges that "the court notes that it has jurisdiction over this matter." "Defendant properly removed the case to this court." ORDER, Doc 19, p3. This is on the basis of diversity of citizenship when the civil actions in controversy exceed \$75,000. However, it is a federal question as well because Bryan Reo is asking for an unconstitutional "gag order" and seeking, along with his co-conspirators to violate the First Amendment civil rights of Pastor Lindstedt and Lindstedt's non-501(c)(3) Church using abuse of legal process and vexatious and frivolous litigation to shut them up about the truth about Bryan Reo and Bryan Reo co-conspirators like Reo's wife, father, and lawyer friends. Thus they are in a conspiracy under 42 U.S.C. 1983 and 1985. If the federal government is working Reo and Reo conspirators as agents

provocateur and paying them through confiscation of Pastor Lindstedt's property then the federal government is being sued as well and this court has additional jurisdiction to hear the case. In no instance does Pastor Lindstedt slip out of this matter once initiated by lessening the litigation amount below \$75,000 so Pastor Lindstedt is trying to use discovery to joinder additional Reo conspirators as well as counter-suing for \$500,000 against Bryan Reo.

IV. ANSWERING BRYAN REO LIES / REO 'FACTS' – 19CV001304 (this case removed)

12. *Bryan Reo - #7 p3 said:* *Defendant has a long history of libeling Plaintiff and Defendant lost a jury trial in the consolidated cases of 16CV000825 and 15CV1590 with a verdict being rendered in Plaintiff's favor on claims of defamation per se and false light on 6/26/2019 for libel that occurred throughout 2015 and 2016. The jury awarded Plaintiff \$105,000.00 against Defendant Martin Lindstedt.*

13. Answer: Bryan Reo has a long history of defaming Pastor Lindstedt both in 2010, at the trial held in Lake County absent jurisdiction and indeed in Doc. 10, Exhibit 1 when Reo called Pastor Lindstedt a "child molester". In retaliation since Pastor Lindstedt has called Bryan Reo a homosexual mongrel and agent provocateur causing trouble for the White Supremacy movement every year since October 2010. Both parties are public figures within the White Supremacist and Christian Identity Movements. Thus this name-calling should have no purchase before the Lake County Ohio courts nor this federal court. Rather what should be decided is whether Bryan Reo is as a licensed attorney and officer of both the state and federal courts abusing legal process in order to enrich himself under color of law. Therefore Pastor Lindstedt is counter-suing Bryan Reo, and Reo's wife and father and Reo's attorney friends Kyle Bristow and Brett Klimkowsky for \$500,000 apiece.

14. *Bryan Reo - #8-13 p3 said:* On September 9, 2018 Defendant published on the worldwide web a statement that Plaintiff was using Lake County Court of Common Pleas for purposes of "barratry." <http://www.whitenationalist.org/forum/showthread.php?p=18592#post18592>. Then in paragraphs 9-13 Bryan Reo defines "barratry" and claims to "never engaged in barratry or

vexatious litigation” or unprofessional conduct if not criminal conduct and not at the trial cases.

15. Defendant’s Answer. The post in question is for the Lake County Court and the footers for that Court’s forum profile refer to that Court as “The Mamzer From Mentor’s Barratry Playground”. In Pastor Lindstedt’s opinion the Lake County Court is indeed Bryan Reo’s – The Mamzer (Mongrel) From Mentor – Barratry Playground, indeed a “Perjury Parlor.” That corrupt county court lets Bryan Reo run wild shaking down companies for TCPA violations as well as let Bryan Reo defame and harass Pastor Lindstedt and Lindstedt’s Church, violate the First Amendment, and conducted a corrupt trial in which Pastor Lindstedt was not allowed to present evidence on his behalf nor his Church. The jury was biased and the judge disallowed Pastor Lindstedt’s jury instructions, specifically those which would have sanctioned Bryan Reo for abuse of legal process and tortuous interference with Pastor Lindstedt’s web pages and proven that Bryan Reo, along with William Finck were acting together to supplant genuine DSCI beliefs, and that Bryan Reo committed numerous acts of perjury in now pretending to have never played White Supremacist or Christian Identity. Yes, the Lake County Courts are corrupt. This is why everyone as well as Pastor Lindstedt removes Bryan Reo cases from Lake County to this federal court in Cleveland.

16. Bryan Reo paragraph 14, pages 3-4: *On September 14, 2018, Defendant published a defamatory document on the worldwide web stating that Plaintiff had engaged in stalking, was a homosexual, and was stalking a man for purposes of coercing homosexual sex from the man. Defendant also claimed that Plaintiff had engaged in criminal stalking of Defendant. Stalking is a 'crime as defined by the Ohio Revised Code, 2903.211, and a statement meant as a factual assertion that Plaintiff was committing said crimes is defamatory per Se. Plaintiff never stalked Defendant nor the third parties whom Defendant claimed Plaintiff was stalking. Plaintiff is not a homosexual, has never had homosexual sex, and has*

never attempted to coerce or blackmail homosexual sex from any individual. See <http://whitenationalist.org/forum/showthread.php?p=18615#post18615>

17. Pastor Lindstedt's Answer: Looking at the post in question it is from the 17 Sept. 2018 Defendant's Cause of Action in which Defendant recounted Bryan Reo's stalking of John Britton:

http://bryanreo-lawsuits.xyz/2018/Sep18/14Sep18_ML/14Sept18_Cause%20of%20Action.pdf

Bryan Reo insinuated itself into John Britton's helicopter crash federal civil lawsuit, *Britton v. Dallas Airmotive, Inc.* 07-CV-00547-EJL after much stalking and tried to inform that John Britton was Aryan Nations, etc. and as "Bryan Nicewonger" gloated about ruining John Britton's case. See: http://bryanreo-lawsuits.xyz/2011/Britton_v_RollsRoyce/June11/438_061011_Order_No%20Dismissal.pdf

Normal heterosexual White Supremacists do not go on homosexual web pages and impersonate Aryan White Supremacists like Bryan Reo did against John Britton and Pastor Lindstedt. Bryan Reo did this routinely over the past decade that Pastor Lindstedt has known Reo. While Bryan Reo probably doesn't have a homosexual man-crush on Pastor Lindstedt like it did on John Britton and another person known as "Victor Switzer" of Pine Bluff Arkansas who was outed as having a full-blooded Choctaw grandfather when he refused Bryan Reo's homosexual advances or so the story goes. While Pastor Lindstedt hasn't seen Bryan Reo engaged in homosexual activity there is no doubt based upon observation that Bryan Reo is a particularly predatory and noxious homosexual. This is another attempt by Bryan Reo to gin up a bogus and frivolous cause of action in order to steal under color of law Lindstedt's SD inheritance.

18. Bryan Reo paragraph 15, p 4 Complaint: . *On September 17, 2018 Defendant posted on the worldwide web, referring to the then presiding judge as "crooked" which is relevant to the extent that Defendant would later claim that Plaintiff was in collusion with the trial court judge and was conspiring with the judge to corrupt the proceedings of the jury trial conducted June 24-26 of 2019. Plaintiff was never in collusion with any judge, never conspired with any judge, and never worked to corrupt any*

proceedings. Accusations that Plaintiff engaged in such conduct would be highly defamatory because they would be accusations of criminal conduct and accusations that Plaintiff violated the Rules of Professional Conduct. <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18624#post18624>

19. Defendant's Answer: In all of these allegations Bryan Reo makes a claim and then an argument that it finds making fun of it as an incompetent and crooked lawyer filing frivolous motion after motion to strike, or in this case after over three years of litigation and seven or eight cancelled trial dates, most of them cancelled by Bryan Reo on frivolous excuses, Bryan Reo whines that Pastor Lindstedt ridiculed its Motion to Amend its Complaint and found it frivolous and vexatious because by then Bryan Reo knew that it didn't have a case because of the Ohio Statute of Limitations. Bryan Reo filed such a Motion, it failed, Bryan Reo filed an Appeal when the "crooked judge" denied its foolishness and found out that its refused Motion wasn't appealable. That Bryan Reo is a lying shyster and unprofessional isn't untrue.

20. Bryan Reo paragraph 16 page 4-5. *On October 2, 2018, Defendant posted on the worldwide web, using Plaintiff's name to make the post, a copy of an affidavit Plaintiff had submitted, in support of a motion for summary judgment, in the consolidated 16CV000825 and 15CV001590 case and declared that the affidavit was perjury. The affidavit contained only truthful statements and there were no perjured statements in the affidavit. A statement meant as a factual assertion that Plaintiff violated R.C. 2921.11 is defamatory per se because it is an allegation of criminal conduct and violation of the rules of professional conduct.*

<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18624#post18624>

21. Defendant's Answer: The Affidavit of Bryan Reo in support of one of its many vexatious and frivolous Motions for Summary Judgment was mainly all a pack of lies and Defendant said as much. Bryan Reo is a public figure and Defendant told the truth about Bryan Reo.
http://bryanreo-lawsuits.xyz/2018/Sep18/28Sept18_BR_Summary/BR_Affidavit_28Sep18.pdf

22. Bryan Reo para 17, p 5 complaint: *On October 15, 2018, Defendant posted on the worldweb wide, using Plaintiff's name to make the post, allegations and statements that Plaintiff was conspiring with then presiding Lake County Judge Collins to submit perjured filings for the purpose of barratry. A statement meant as a factual assertion that Plaintiff violated R.C. 2921.11 is defamatory per se because it is an allegation of criminal conduct and violation of the rules of professional conduct.*

<http://whitenationalist.org/forum/showthread.php?p=18752#post18752>

23. Defendant's Answer: Bryan Reo complains about Pastor Lindstedt posting and making fun of its vexatious and frivolous Motion to Strike of 9 Oct. 2018 and more mailing irregularities. Yes, Defendant thinks that Bryan Reo is an incompetent and unprofessional crooked lawyer.

24. Bryan Reo para 18, p 5. *On October 25, 2018 Defendant posted on the worldwide web, using Plaintiff's name to make the post, allegations that Plaintiff had filed a "frivolous" federal lawsuit which Defendant implied had been dismissed by virtue of being determined and judged frivolous. Said lawsuit involved Plaintiff and Defendant, the parties were the same, and Defendant was well-aware that the lawsuit was dismissed without prejudice for lack of subject matter jurisdiction, it was never adjudicated on the merits, and no findings were ever made that even suggested the lawsuit was frivolous. A statement meant as a factual assertion that Plaintiff had brought a frivolous lawsuit in violation of the Rules of Civil Procedure and the Rules of*

Professional Conduct would be an allegation of unprofessional conduct and would be defamatory per Se. Defendant also cast the circumstances surrounding the federal lawsuit in false light and presented them in such a way that an ordinary observer or reader might find Plaintiff highly offensive if the observer came to believe Defendant's false light story that the lawsuit had been dismissed for having been deemed frivolous. See

<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18787#post18787>

25 Defendant's Answer: Yet again Bryan Reo objects at Pastor Lindstedt reposting its own vexatious and idiotically dishonest legalistic ravings in a manner which goes to show how idiotic Bryan Reo's motions really are. The federal judge dismissed Bryan Reo's case because the DMCA action in which Bryan Reo sued for reposting its 2004 Mentor High School picture and Facebook public profile picture was "futile." Nor could Bryan Reo, given a total of 50 days to try, prove that it had suffered any damages, much less \$75000 worth. That Bryan Reo is an especially crooked and witless lawyer much less unprofessional should be obvious to everyone and has been commented upon by judges in the federal and state circuits.

26. Bryan Reo para 19 p6. *On November 8, 2018, Defendant posted on the worldwide web, using Plaintiff's name to make the post, statements meant as factual assertions that Plaintiff had requested a continuance in the then ongoing consolidated 15CV and 16CV case, for the purpose of going to Paraguay to obtain sex reassignment surgery on the basis that Defendant was claiming Plaintiff was a mentally ill homosexual. An allegation that a professional, specifically an attorney, is mentally ill, is an allegation that he is unfit to perform the duties of his trade or*

his profession and would cause potential clients and other attorneys to doubt his fitness to practice law. Plaintiff is not mentally ill, Plaintiff has never sought sexual reassignment surgery, and Plaintiff is neither a homosexual nor a transsexual nor does Plaintiff have any personality disorder, mood disorder, thought disorder, or mental illness as defined by the current or previous versions of the DSM. Defendant's allegations constituted defamation per se.*

<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18858#post18858>

27. Defendant's Answer. First of all Bryan Reo is at least a limited-purpose public figure whose behavior has indicated that it acts as a homosexual predator as well as not being even remotely white. Thus its past actions indicate that it since 2003 has been playing off and on at being a white supremacist. Whether potential clients knowing of Bryan Reo's past (and current) history as a wannabe white supremacist would draw certain conclusions as to Bryan Reo's legal abilities is not something which Pastor Lindstedt is responsible for as long as it is truthful. Bryan Reo called Pastor Lindstedt a "convicted child molester" on its Wordpress blog given to it by its co-conspirator jew ZOGbot William Finck since 5 Nov. 2010. Bryan Reo called Pastor Lindstedt a child molester at trial in Lake County on 24-26 June 2019. Bryan Reo called Pastor Lindstedt a child molester before this Court saying "he was incarcerated and institutionalized for approximately 5 years after being charged with statutory sodomy on a minor under 12 years of age." (Plaintiff's Brief in Opposition, Doc 10, p3-4, 10 Oct. 2019). Bryan Reo needs to understand that when you call someone a convicted child molester when you know better and you are a public figure that your target is going to ridicule you back. Bryan Reo's calling Pastor Lindstedt a "convicted, incarcerated and institutionalized child molester should finish all of

Bryan Reo's past and present defamation litigation against Pastor Lindstedt forever. When compared to calling Pastor Lindstedt a child molester these little japes about Bryan Reo are nothing comparable. There is no "Mengele Clinic" in Paraguay for Bryan Reo to enjoy.

28. Bryan Reo complaint para 20, p6-7. *On November 11, 2018 Defendant posted on the worldwide web, using Plaintiff's name to make the post, statements meant as factual assertions that Plaintiff, who is married, was having extra-marital homosexual sex, with fellow attorneys throughout Ohio and Michigan. Allegations of marital infidelity and allegations of sex with colleagues and other attorneys are allegations of unprofessional or immoral conduct that would cause Plaintiff to be seen in a highly negative light. Defendant also linked to Plaintiff's Avvo profile and posted the phone number and name of Plaintiff's, law practice, along with Plaintiff's name so there was no doubt as to whom Defendant was referring. The allegations were completely untrue.*

<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=18872#post18872>

29. Defendant Answer. Bryan Reo had on its Avvo web page recommendations from its fellow lawyers from the Foundation for the MarketPlace of Ideas (FMI). Namely Kyle Bristow, Brett Klimkowsky, and Jason Van Dyke. One named James Wertheim was checking out Pastor Lindstedt in the Lake County Courthouse. Kyle Bristow had Bryan Reo as a "law clerk". Richard Spencer, one-eighth jew and admitted homosexual had Kyle Bristow and the rest of the FMI crew working on "lawfare" against State universities after the Charlottesville Debacle. Spencer and Bristow did a twitter picture looking like two homosexuals with cigars. So the FMI consists mainly of lawyers pretending to be White Supremacists when they were jews, mongrels

and/or homosexuals and all of them were ZOGbots. In the case of Jason Van Dyke, another incompetent mongrel lawyer who had the bad luck to practice in Texas as opposed to Northern Ohio. Pastor Lindstedt would say of the four FMI lawyers that Bryan Reo was the smartest. Defendant's allegations were meant to show that it is best to avoid all of these lawyers.

30. Bryan Reo paragraph 21, page 7. *Defendant continued to post defamatory content against Plaintiff throughout the rest of 2018 and into 2019.*

31. Defendant Answer: Defendant Pastor Lindstedt has published truthful and First Amendment (supposedly protected except in Lake County Court of Common Pleas) material about limited-purpose or public figure Bryan Reo pretending to be a White Supremacist and Christian Identity sub-pastor of William Finck ever since Pastor Lindstedt found out Bryan Reo's identity around Halloween 2010 and has printed the facts about Bryan Reo ever since for the motive of getting Bryan Reo out of the Movement and so no one will ever be preyed upon through ignorance about the nature of Bryan Reo as a delusional homosexual Satanic mongrel abomination working for the federal government as an informant and agent provocateur. Bryan Reo was fired from its job at the North Perry Nuclear Power Plant after a series of accidents and the power plant operators figured out enough to do a google search on Bryan Reo and found out that Bryan Reo is a self-loathing homosexual mongrel pretending to be a White Supremacist and fired Reo. Likewise with anyone wanting to hire a lawyer who sees who and what exactly Bryan Reo is and come to the obvious conclusion that it is far safer to simply have nothing to do with Bryan Reo. The past lawsuit under appeal simply goes to show that lawyers, and judges should be exterminated on sight as conducive to the administration of true justice. This lawsuit by Bryan Reo, Reo's wife & Reo's father is simply a money grab of Pastor Lindstedt's inheritance.

32. Bryan Reo para 22 page 7. *On June 26, 2019, Defendant posted on the worldwide web, under the name of Lake County Court Administrator the false statement that Defendant Pastor Martin Lindstedt had prevailed against Bryan Reo on a counterclaim of libel per se and that the jury found in favor of Martin Lindstedt in regards to the counterclaim alleging that Bryan Reo defamed Martin Lindstedt as a child molester and a pedophile. The jury actually found for Plaintiff Bryan Anthony Reo *against* Martin Lindstedt as to that counter-claim, see attached Exhibit 1, copy of judgment from the consolidated 15CV and 16CV case that was tried 6/24/2019 to 6/26/2019 and resulted in the jury verdict as provided in the judgment.*
<http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=19923#post19923>

33. Defendant Answer. Reading the trial transcript after the fact, Bryan Reo kept on defaming Pastor Lindstedt (and Lindstedt's Church) as "child molesters" and the trial judge allowed this to go on and on before the jury. When the above post was made at 11:23 pm on 26 June 2019 Pastor Lindstedt thought that the jury had allowed this reprehensible conduct to go unpunished by refusing to award any damages although they acknowledged the defamation by Bryan Reo. The jury was biased against Aryan Nations to begin with and the corrupt trial court judge in effect told the jury that it was OK to rule altogether against the racist "child molester" and give him nothing but to give Bryan Reo everything. Pastor Lindstedt was mistaken at the time, however that mistake in no way contributed to any damages against Bryan Reo. Rather Bryan Reo had the benefit of not only a corrupt judge but a biased and prejudiced jury.

34. Bryan Reo para 23 p 8: *On July 8, 2019, Defendant posted on the worldwide web, using Plaintiff's name, the allegation that Plaintiff colluded with and conspired with Judge Patrick*

Condon of the Lake County Court of Common Pleas to pervert the proceedings of the jury trial in the consolidated 15CV and 16CV case, for the purpose of "lynching" Defendant. Plaintiff never colluded with Judge Condon, or any judge, Plaintiff never conspired with Judge Condon or any judge, and Plaintiff did nothing to pervert the proceedings or to improperly influence the jury. Allegations that Plaintiff conspired with -a judge and colluded with the presiding judge in a jury trial to influence and corrupt the proceedings are allegations of criminal conduct and unprofessional conduct and constitute defamation per se. Defendant also made claims that Plaintiff conspired and colluded with Judge Condon, with these claims being communicated via a webcast video broadcast made on. June 26 and June 27, 2019 in the aftermath of the trial that concluded June 26, 2019. <http://www.whitenationalist.org/forum/showthread.php?1614-Bryan-Reo-vs-Lindstedt-Case-15CV001590-a-bogus-vexatious-fraudulent-piece-of-litigation-in-Lake-County-Ohio&p=20008#post20008>

35. Defendant's Answer: At any video alluded to (as the above hyperlink doesn't work) then just after trial the overwhelming unfairness of the kangaroo trial would have been expressed by Pastor Lindstedt. As above, the Lake County Court had no jurisdiction to try Pastor Lindstedt and Lindstedt's Church. Bryan Reo called Pastor Lindstedt a convicted child molester. The Ohio Statutes of Limitation O.R.C. 2305.11 (a) was an absolute bar to prosecution because Bryan Reo waited three years before filing the failed federal lawsuit, Judge Condon didn't allow Pastor Lindstedt to present any evidence on his behalf, the Aryan Nations Church never should have been allowed to be sued for "speech and belief", the jury was biased as were the jury instructions, Bryan Reo was beyond punishment for abuse of legal process and malicious prosecution, Bryan Reo perjured itself by disclaiming its agent provocateur role as a practicing wannabe "White Supremacist", etc. Of course Judge Patrick Condon was corrupt and as an

officer of the court Bryan Reo should be sanctioned and disbarred. Bryan Reo whining about Pastor Lindstedt questioning both the process and the results and the persons involved is scarcely defamation except in Bryan Reo's delusional and thieving 'mind'.

36. Bryan Reo paragraph 24, page 8. *Defendant has caused injury to Plaintiff in excess of five hundred thousand dollars (\$500,000.00)*

37. Defendant's Answer. With this claim Bryan Reo has committed criminal fraud through abuse of legal process, by filing two defamation lawsuits, Bryan Reo v. Lindstedt 19CV001304 which has been removed to this federal court, and then another asking for another \$500,000 before the Lake County Court on Sept. 18, 2019 in Bryan Reo v. Martin Lindstedt 19CV001530 after it found out about the removal to this federal court of its first 'defamation' lawsuit. (Also removed to this federal court, *Reo v. Lindstedt* 19-cv-02589) Acting in criminal conspiracy with its wife, Stefani Rossi Reo v. Martin Lindstedt 19CV001466 (in process of being removed to this federal court) and father Anthony Dominic Reo v. Martin Lindstedt 19CV001531 (removed to federal court as 19-cv-0265) with four bogus and frivolous lawsuits they expect to steal through abuse of legal process Pastor Lindstedt's entire South Dakota inheritance of 1800 acres worth approximately \$2 million. Bryan Reo has plotted with William Finck to do so since its federal lawsuit back in August 2014, in its civil complaint filed in 19CV00001304 on page 11 under punitive damages it asks for the entire \$2 million dollar property for its delusional and thieving demands for damages. Indeed it has already tried to extort Pastor Lindstedt for \$2,500,000 to "settle" in an e-mail sent to Pastor Lindstedt on behalf of Reo's entire criminal family on Oct. 5, 2019.

<http://whitenationalist.org/forum/showthread.php?p=20441#post20441>

The screen shot of this extortionary demand has already been submitted to this court in Defendant's Doc. 13 Exhibit 1 filed on Oct. 10, 2019 albeit page #2 wasn't scanned in.

http://bryanreo-lawsuits.xyz/2019/NewtonCounty/Oct19/5Oct19/BR2MLb_5Oct19_814pm.jpg

38. Bryan Reo, Bryan Reo's father Anthony Dominic Reo and Reo's wife should be criminally charged and prosecuted for this extortionary scam as well as Reo sanctioned and disbarred for criminal activity as an officer of this federal and state court system.

IV. PASTOR LINDSTEDT'S COUNTER-CLAIM AGAINST BRYAN REO AND REO DEFENDANTS

39. Bryan Reo has made it quite clear that it is filing four fraudulent defamation actions, two by itself, one by its wife and one by its father for \$500,000 each in order to take away through legal activity before the Lake County Courts Pastor Lindstedt's South Dakota inheritance or at the very least beggar Pastor Lindstedt through having to defend himself through this legal activity. These actions have been removed to federal court and this court is refusing to allow Pastor Lindstedt to file defensively through electronic filing, forcing Pastor Lindstedt to defend himself via the expensive and slow US Mail, in which Pastor Lindstedt's response time is slowed by the necessity of allowing three days for the mail to arrive. Thus Bryan Reo is allowed to abuse the court system of Lake County and this federal court in order to make of Pastor Lindstedt a professional defendant to Bryan Reo and Reo family professional plaintiffs.

40. Bryan Reo made it quite clear that he wants Pastor Lindstedt's South Dakota ranch worth around \$2 million by filing these four lawsuits. Bryan Reo found out about Pastor Lindstedt's inheritance in 2013, so Reo took down its web pages on William Finck's blog calling Pastor Lindstedt a "convicted child molester" and initiated its first federal lawsuit in April 2014. Since then Bryan Reo has given Pastor Lindstedt and Lindstedt's Church no rest in the federal and

state courts for the better part of six years. Pastor Lindstedt has reported the truth about Bryan Reo, Reo's lawyer friends, and Reo's fellow agents provocateurs infesting the White Nationalist and Christian Identity Movements. Bryan Reo isn't white or heterosexual. Practically nothing has been said about Bryan Reo's wife and father, not even their names.

41. The only way for this "legal terrorism" on the part of Bryan Reo and Reo co-defendants to end against Pastor Lindstedt is for Reo to be successfully counter-sued and Reo to be disbarred and constrained from further practice before the state and federal courts, along with Reo's lawyer friends Kyle Bristow and Brett Klimkowsky. Bryan Reo's wife and father need to be likewise deterred from signing on as Bryan Reo "clients" in trying to steal Pastor Lindstedt's inheritance to which they are not entitled to. Therefore today Pastor Lindstedt is counter-suing Attorney Bryan Reo, Bryan Reo's wife Stefani Rossi Reo, Bryan Reo's father Anthony Domenic Reo, and Attorneys Kyle Bristow and Brett Klimkowsky for this fraudulent litigation versus Pastor Martin Lindstedt, as ORDERED by this Court to amend Lindstedt's Answer and Counter-claim.

42. Likewise the Lake County Ohio Court System in general and Judge Patrick Condon in particular need to be constrained from in effect repealing and/or violating the First Amendment by exceeding their jurisdictional limits by dragging forth an Aryan Nations pastor and his Church across state lines 900 miles away to face charges of racism for daring to write the truth about a professional anti-racist activist practicing "lawfare" before a hostile jury acting as a lynch mob in which a corrupt judge doesn't allow said Southern White Man to present any real defense. At this time Pastor Lindstedt is not making a formal counter-claim against Lake County or Judge Condon for allowing Bryan Reo to run wild on the "lawfare" against Pastor Lindstedt sans any jurisdiction over what is said over the Internet between old enemies who are public figures. However, upon discovery a claim by Pastor Lindstedt for these violations of the First

Amendment under 18 42 U.S.C. might well be filed against the Lake County Court and Judge Condon for exceeding their jurisdiction to where they are allowing Bryan Reo to censor the Internet against Reo's enemies dating from the days Reo was pretending to be a racist leader.

43. The State of Ohio. The State of Ohio has granted patents of nobility (Esquire) to a parasitic class of vermin which have taken over the court system known as licensed attorneys / Officers of the Court without taking much, if any, care as to their integrity or allegiance to either the law or truth. The end result is that lawyers get to define for themselves a sort of monopoly license to steal under color of law by filing vexatious litigation such as that which Bryan Reo filed against Pastor Lindstedt, Roxie Fausnaught and Pastor Lindstedt's Church of Jesus Christ Christian / Aryan Nations of Missouri non-profit, non-501(c)(3) Church secure in the knowledge that this Dual-Seedline Christian Identity Church views these worldly governments as being run by Satan and thus refuse to hire one of Satan's minions, i.e. lawyers especially one to protect them against one of Satan's spawn, i.e. Bryan Reo and family and friends. The proper way to defend one's church is to on occasion strike back through open religious and civil warfare so that the State recognizes that it is far safer to let the Church alone in peace. Bryan Reo has deliberately used this usurpation and denial of the First Amendment to whip up Northeastern liberal jurors against racist Aryan Nations types like Pastor Lindstedt and Lindstedt's Church in Lake County and is hoping to take his act to the federal jury in Cleveland. As this is an answer and counter-claim today Pastor Lindstedt is not going to add the State of Ohio on as a party to this lawsuit, indeed Judge Solomon has discouraged Pastor Lindstedt from doing so. However, upon discovery Pastor Lindstedt wishes to raise the federal question under 42 U.S.C. 1983 as to whether the State of Ohio and its courts can deny non-commercial churches from defending themselves for

exercising their First Amendment rights without having to use the services of the very parasitic class of regime criminals which are violating these supposed guaranteed civil rights.

44. The Federal Government, especially the US Attorney for the Northern District of Ohio. Bryan Reo is a non-white anti-racist activist turned pretend white supremacist / Christian Identity sub-pastor under Eli James and William Finck who has admitted to being a federal informant upon occasion. Pastor Lindstedt thinks that along with the entire 'former' Foundation for the Marketplace of Ideas founded by Bryan Reo, Kyle Bristow and Brett Klimkowsky and Richard Spencer as a White Supremacist "lawfare" 501(c)(3) organization which is still active against Pastor Lindstedt and Lindstedt's Aryan Nations Church that the FBI and other federal government organizations are sponsoring this violation of the civil rights of Pastor Lindstedt and Lindstedt's Church through its own domestic state-sponsored terrorism apparatus. US Attorney Justin Herdman gave out a press release against "lone wolves" wanting to engage in random shootings this October, while at the same time letting informants and agents provocateur to run wild destroying dissent through its own court system by allowing Bryan Reo, Bristow and Klimkowsky to "lawfare" Pastor Lindstedt and Lindstedt's Church. As this is an answer and counter-claim today Pastor Lindstedt is not going to add the US Government on as a party to this lawsuit, indeed Judge Solomon has discouraged Pastor Lindstedt from doing so. However, upon discovery Pastor Lindstedt wishes to raise the federal question under 42 U.S.C. 1983 as to whether this federal government and its courts can deny non-commercial churches from defending themselves for exercising their First Amendment rights without having to use the services of the very parasitic class of regime criminals which are violating these supposed guaranteed civil rights under its own Constitution

V. TRIAL BY JURY DEMANDED

45. Defendant respectfully demands a trial by jury on all of the issues set forth herein that are triable by right. Civ.R. 38.

VI. CAUSES OF ACTION

COUNT I COMMON LAW DEFAMATION

46. The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.

47. Defendant denies publishing false and defamatory statements about Plaintiff to third-parties via the medium of the World Wide Web. Rather Defendant published public records and Plaintiff's own words and submissions while Plaintiff kept on maliciously libeling Defendant as a "child molester".

48. Defendant's true statements about Plaintiff were made by Defendant without need for any privilege given that they were about a limited-purpose public figure like federal antifa informant and ZOGbot Bryan Reo within the White Supremacist and Christian Identity Movement.

49. Defendant acted without any negligence in making accurate and true statements about Plaintiff and Plaintiff's motivations.

50. Defendant acted reasonably in attempting to discover the truth or falsity of Bryan Reo's past and current history pertaining to pretending to be something it was not, i.e. a white supremacist or competent or ethical attorney in publishing commentary about Plaintiff.

51. Defendant's true and accurate statements about Plaintiff are not defamatory per se insofar as said statements reflect upon the character of Plaintiff by bringing him into ridicule, hatred, or contempt, which are the expected results for Plaintiff's actions and while the truth might well

affect Plaintiff injuriously in his future trade or profession this is what is to be expected given limited-purpose public figure's Plaintiff's known or suspected behavior and conduct.

52. Defendant's true and largely accurate statements about public-figure Plaintiff are not defamatory per se to the extent that some of the statements in question would lead to allegations or accusations of criminal conduct in violation of various sections in the Ohio Revised Code.

53. Defendant did not commit against public figure Plaintiff the common law tort of libel per se because Plaintiff has no "right" to before the public pretend to be a virtuous lawyer while before a different Internet audience pretend to be a White Supremacist / Nationalist or Christian Identity leader or policy maker. Bryan Reo had many chances to leave pretending to be a White Supremacist leader but instead has seen fit to file these frivolous and malicious litigation against Defendant as a personal enemy.

54. Rather Plaintiff Bryan Reo, Reo co-conspirators Stefani Rossi Reo and Attorney Kyle Bristow have knowingly libeled per se Pastor Martin Lindstedt by continually libeling him as a "convicted child molester" or "pedophile" from 2010 to at trial in June 2019 to today in e-mails while perfectly aware that this matter didn't even proceed to a preliminary hearing much less conviction or incarceration. The notion of Bryan Reo is that they get to libel Pastor Lindstedt while suing Pastor Lindstedt for innocuous statements of opinion and true fact posted upon the Internet. All the parties counter-sued today are the libelers or Bryan Reo libel enablers.

COUNT II COMMON LAW INVASION OF PRIVACY – FALSE LIGHT

55. The foregoing paragraphs of this Answer / Counter-Complaint are incorporated by reference as if fully set forth herein.

56. Defendant made no false and derogatory statements about Plaintiff that Defendant publicized via the medium of the World Wide Web. Rather these statements were substantially true.

57. These truthful and informative statements made by Defendant about Plaintiff placed Plaintiff before the public in an accurate light.

58. The true and accurate statements made by Defendant about limited-purpose public figure Plaintiff Bryan Reo are highly offensive only to people who wish to be offended, and not to a reasonable person who probably doesn't care one way or another about Bryan Reo.

59. Defendant is not at fault and knew or acted responsibly as to the truth of the statements made by Defendant that concern Plaintiff.

60. As a direct and proximate result of Defendant's statements about Plaintiff, Plaintiff has been and will continue to suffer largely imaginary and mythical damages claiming mental anguish and reputational injury. Bryan Reo abandoned many chances to stop fighting with Pastor Lindstedt but instead insisted on filing these fraudulent and frivolous litigation seeking a payback before a judge and jury located within its chosen venue as opposed to Pastor Lindstedt's home territory.

61. Defendant didn't commit against limited-purpose public figure Plaintiff Bryan Reo the tort of invasion of privacy – false light. Rather Plaintiff Bryan Reo is committing against Defendant Pastor Martin Lindstedt the tort of abuse of legal process, malicious prosecution, etc.

COUNT III COMMON LAW INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

63. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.

64. By and through publishing largely truthful statements of fact about Plaintiff to third parties via the medium of the World Wide Web, Lindstedt engaged in First Amendment protected conduct. Anti-Racist Activist Bryan Reo decided to pretend to be a White Supremacist one minute, called Pastor Lindstedt a "convicted child molester" and then when Reo learned Pastor Lindstedt had an inheritance to steal promptly destroyed evidence of its conduct, has tried to take

down Lindstedt's web pages and proof of Reo misconduct, and filed these frivolous legal actions in Lake County Ohio and Ohio federal court. Bryan Reo could have left off fighting with Pastor Lindstedt but that would mean not being able to steal Pastor Lindstedt's assets or silence under color of law Pastor Lindstedt and that did not suit Bryan Reo's malicious purposes.

64. Lindstedt denies acting with an intentional or reckless *scienter* when Lindstedt published these true statements of fact and opinion about public figure Plaintiff.

65. Due directly and proximately to Lindstedt publishing these true statements of fact about Plaintiff, Plaintiff has claimed, falsely severe emotional distress in the form of vexation, irritation, anxiety, frustration, and hatred. All these emotions are part and parcel of being Bryan Reo. Bryan Reo has instead been the one stalking Pastor Lindstedt and this conflict would have ended back in 2010 if Bryan Reo didn't want to continue this conflict.

66. Lindstedt not liable to Plaintiff for common law intentional infliction of emotional distress, but rather Bryan Reo is responsible for this vexatious and frivolous and malicious litigation.

COUNT IV PERMANENT INJUNCTION / PERMANENT DISBARMENT OF BRYAN REO

67. The foregoing paragraphs of Defendant's Answer & Counter-Complaint are incorporated by reference as if fully set forth herein.

68. The improper and unlawful conduct of Plaintiff in making this frivolous and malicious litigation is made overt by Bryan Reo continuing to demand a "gag order" on Pastor Lindstedt continuing to report on Bryan Reo misconduct. Demanding permanent injunctive relief from publication by Plaintiff about Bryan Reo misconduct shows that the goal of Bryan Reo litigation is censorship and improper enrichment through abuse of legal process, not justice.

69. In the absence of the entry of a permanent injunction by the Court, Plaintiff will suffer no serious or irreparable harm and injury, but rather be known for his true reputation.

70. The entry of a permanent injunction will harm or burden Defendant because Defendant is allowed under the First Amendment of the US and of Ohio to speak freely concerning public figure Bryan Reo who has pretended to be one of us White Supremacists or Christian Identity. Bryan Reo saying otherwise merely goes to show Bryan Reo's motivations are evil and corrupt. There would be no such thing as a World Wide Web if left to the likes of Reo

71. Public policy favors at least the pretense of a First Amendment protecting the Free Exercise of Speech, of the Press, and of Religion, not pre-publication censorship of embarrassing truths concerning limited-purpose public figure Bryan Reo. This public policy thus favors the the entry of a permanent injunction and disbarment of Bryan Reo from filing this sort of malicious litigation against Pastor Lindstedt, Lindstedt's Church and against others by Bryan Reo.

72. Plaintiff has the adequate remedy available at law of proper behavior including not filing these frivolous litigation attempts to enrich himself, his family and friends at Pastor Lindstedt's expense. The First Amendment is not to be set aside because Bryan Reo doesn't like criticism.

73. Plaintiff is not entitled to a permanent injunction in which Defendant is compelled to remove from the World Wide Web and not republish thereto any and all derogatory materials Defendant or Defendant's agents published there about Plaintiff. Merely asking for this destruction of the First Amendment is proof positive that this litigation by Bryan Reo is for purpose of unjust enrichment and censorship against Pastor Lindstedt.

VI. PRAYER FOR RELIEF

Judge Oliver Solomon ORDERED Defendant Pastor Martin Lindstedt to file an Amended Answer within 14 days of his ORDER of November 18, 2019 (Doc 19). Defendant has cut down quite a bit of the racism which is inherent in the decade-long conflict between Plaintiff Bryan Reo who used to pretend to be a fellow White Supremacist / Christian Identity even

though he wasn't white and Defendant Pastor Martin Lindstedt who has been truthfully reporting about limited-purpose public figure or public figure Bryan Reo. Defendant has removed all of the Bryan Reo, Bryan Reo's wife and father's litigation meant to steal Pastor Lindstedt's inheritance from Lake County to this federal district court where it is presently in four separate federal cases. Pastor Lindstedt has "borrowed" much of Bryan Reo's civil complaint and turned it around in this, Pastor Lindstedt's Amended Answer and Counter-Complaint. Pastor Lindstedt is only counter-claiming those directly involved in this particular lawsuit, i.e. Bryan Reo, Bryan Reo's wife and father, Bryan Reo's fellow lawyer friends Kyle Bristow and Brett Klimkowsky. Pastor Lindstedt is reserving until discovery finds out the causality of other Reo co-conspirators and whether it is a federal question involving the Lake County Courts / Judge Patrick Condon, the State of Ohio and the Federal Government as to whether they are violating Pastor Lindstedt and Pastor Lindstedt's Church's Constitutional Rights and using 42 U.S.C. 1983 civil rights law to do so . . . later. This is at present as good as Pastor Lindstedt can do as a "good faith" effort. Doubtless Bryan Reo will file numerous Motions to Strike as that is all Bryan Reo is capable of doing. Pastor Lindstedt again requests the ability to file electronically in response to the torrent of Bryan Reo litigation. Pastor Lindstedt has filed a Report of the Nov. 22d Case Management sitdown with Bryan Reo in which Bryan Reo wants a quick jury trial in December and Pastor Lindstedt wants full discovery. Pastor Lindstedt is running short of funds to defend himself and his inheritance from Bryan Reo litigation and asked to be able to telephone in during the Case Management Conference 853 miles away and to be able to render care to his elderly domestic partner Roxie Fausnaught at their shared residence in Granby Missouri.

WHEREFORE, Defendant Pastor Martin Lindstedt prays that this Court will enter judgment against Plaintiff Bryan Reo (and Bryan Reo co-conspirators) in Defendant's favor in

an amount of money that exceeds five hundred thousand dollars (\$500,000.00) for general and special damages, award Defendant punitive damages against Plaintiff in an amount the Court deems just and proper, award Defendant all costs associated with maintaining the instant civil action, award Defendant all pretrial and post-trial interest on any and all monetary relief awarded to Defendant, award Defendant injunctive relief by sanctioning Bryan Reo from trying to regulate / censor the World Wide Web through this frivolous litigation and to disbar Bryan Reo from being an officer of this award Defendant all other relief to which Defendant is entitled as a matter of law or equity.

Hail Victory!!!

A handwritten signature in cursive script, reading "Martin Lindstedt Pastor LTC AND".

Pastor Martin Lindstedt, Defendant of and for

The Church of Jesus Christ Christian / Aryan Nations of Missouri (pastorlindstedt@gmail.com)

338 Rabbit Track Road, Granby Missouri 64844 (Tel #) 417-472-6901

Certificate of Service

I, Pastor Martin Lindstedt do hereby certify that a true and genuine copy of the foregoing Answer / Counter-Suit / Counter-Claims has been dispatched by United States mail on 25 November 2019 to Plaintiff Bryan Reo at:

Plaintiff Attorney Bryan Reo, 7143 Rippling Brook Lane, P.O. Box 5100, Mentor Ohio 44061

Plaintiff will endeavor to obtain service upon the following once the judge has approved this Amended Answer and Counter-Complaint:

Stefani Rossi Reo with Attorney Bryan Reo as her lawyer. 7143 Rippling Brook Lane
P.O. Box 5100, Mentor Ohio 44061

Anthony Dominic Reo with Attorney Bryan Reo as his lawyer, 7143 Rippling Brook Lane, P.O.
Box 5100, Mentor Ohio 44061

Attorney Kyle Bristow, Esq. 42383 Garfield Rd, Mt. Clemens MI, PO Box 381164 Clinton
Twp 48038

Attorney Brett Allan Klimkowsky, Esq. P.O Box 114, Martin Ohio 43445 (419-360-1738)